

1 Christina N. Goodrich (SBN 261722)
Christina.goodrich@klgates.com
2 Cassidy T. Young (SBN 342891)
cassidy.young@klgates.com
3 K&L GATES LLP
10100 Santa Monica Boulevard
4 Eighth Floor
Los Angeles, CA 90067 Telephone:
5 +1 310 552 5000 Facsimile: +1 310
552 5001

6
7 *Attorneys for Plaintiff Entropic
Communications, LLC*

8
9 **UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

10 ENTROPIC COMMUNICATIONS, LLC,
11 Plaintiff,
12
13 vs.
14 DISH NETWORK CORPORATION, *et*
al.,
15 Defendants.

Case No.: 2:23-cv-01043-JWH-KES

**DECLARATION OF CHRISTINA
N. GOODRICH IN SUPPORT OF
ENTROPIC COMMUNICATIONS,
LLC'S OPPOSITION TO
DEFENDANTS' MOTION TO
DISMISS FOR IMPROPER
VENUE UNDER RULE 12(b)(3)**

16 Date: October 6, 2023
17 Time: 9:00 a.m.
18 Courtroom: 9D
19
20
21
22
23
24
25
26
27
28

DECLARATION OF CHRISTINA N. GOODRICH

DECLARATION OF CHRISTINA N. GOODRICH

I, Christina N. Goodrich, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California, and I am a partner at the law firm of K&L Gates LLP. I am one of the attorneys on the K&L Gates team representing Plaintiff Entropic Communications, LLC (“Plaintiff” or “Entropic”) in the above-entitled action. This declaration is based on personal knowledge of the matters set forth in this declaration and based on documents on file with the Court and maintained as part of the Firm’s client files in this action. If called upon to testify regarding these matters, I could and would do so competently.

2. On July 13, 2023, this Court granted the parties’ stipulation to conduct venue discovery in this action. *See* DE 79.

3. Accordingly, Entropic served venue-related document requests on Defendants DISH Network Corporation, DISH Network L.L.C., and Dish Network Service L.L.C. (collectively, “DISH”) on May 19, 2023. DISH served written responses to these requests on June 20, 2023.

4. On June 20, 2023, Entropic served a deposition and document subpoena on X Factor Communications Inc. (“X Factor”) as part of its venue discovery. X Factor designated Eric Stefani as its representative, and my colleague, George Summerfield, deposed Mr. Stefani on August 16, 2023.

5. Attached hereto as **Exhibit A** is a true and correct copy of the “About DISH” page on DISH’s website. *See* <https://about.dish.com/company-info>. I visited this webpage and downloaded a copy of the “About DISH” page on August 20, 2023.

6. Attached hereto as **Exhibit B** is a true and correct copy of DISH California Services Corporation’s (“DISH California”) Articles of Incorporation. DISH produced this document to Entropic on June 20, 2023 in response to Entropic’s venue-related document requests.

DECLARATION OF CHRISTINA N. GOODRICH

1 7. Entropic served a 30(b)(3) notice on issues relevant to DISH's motion
2 to dismiss for improper venue and Entropic's opposition thereto on August 3, 2023. On
3 August 18, 2023, my colleague, George Summerfield, took the deposition of DISH's
4 30(b)(3) witness, Dan Minnick, on issues relevant to DISH's motion to dismiss for
5 improper venue. Attached hereto as **Exhibit C** is a true and correct copy of the
6 relevant portions of the transcript from the deposition of Dan Minnick.

7 8. Attached hereto as **Exhibit D** is a true and correct copy of DISH's
8 Second Supplemental Responses to Entropic's Venue Interrogatories, which it served
9 on Entropic on August 11, 2023.

10 9. Attached hereto as **Exhibit E** is a true and correct copy of what purports
11 to be the Periodic Report for DISH Network L.L.C., filed on February 23, 2022.
12 DISH produced this document to Entropic on June 20, 2023 in response to Entropic's
13 venue-related document requests.

14 10. Attached hereto as **Exhibit F** is a true and correct copy of what purports
15 to be the Periodic Report for DISH California, filed on November 23, 2022. DISH
16 produced this document to Entropic on June 20, 2023 in response to Entropic's
17 venue-related document requests.

18 11. Attached hereto as **Exhibit G** is a true and correct copy of what purports
19 to be the Periodic Report for DISH Network Service L.L.C., filed on February 28,
20 2023. DISH produced this document to Entropic on June 20, 2023 in response to
21 Entropic's venue-related document requests.

22 12. Attached hereto as **Exhibit H** is a true and correct copy of what purports
23 to be a pay statement issued by DISH Network L.L.C. DISH produced this document
24 to Entropic on June 30, 2023 in response to Entropic's venue-related document
25 requests.
26
27
28

DECLARATION OF CHRISTINA N. GOODRICH

1 13. Attached hereto as **Exhibit I** is a true and correct copy of a decision by
2 the National Labor and Relations Board (“NLRB”), which I accessed and
3 downloaded from the internet on August 13, 2023.

4 14. Attached hereto as **Exhibit J** is a true and correct copy of the transcript
5 of the deposition of X Factor representative Eric Stefani, which took place on August
6 16, 2023.

7 15. Attached hereto as **Exhibit K** is a true and correct copy of what purports
8 to be DISH’s Retailer Agreement with X Factor. X Factor produced this document
9 to Entropic on July 19, 2023 in response to Entropic’s venue-related document
10 subpoena.

11 16. Attached hereto as **Exhibit L** is a true and correct copy of what purports
12 to be DISH’s Retailer Master Business Rules. DISH produced this document to
13 Entropic on July 21, 2023 in response to Entropic’s venue-related document requests.

14 17. Attached hereto as **Exhibit M** is a true and correct copy of what purports
15 to be DISH’s Trademark License Agreement with X Factor. DISH produced this
16 document to Entropic on June 30, 2023 in response to Entropic’s venue-related
17 document requests.

18 18. Attached hereto as **Exhibit N** is a true and correct copy of what purports
19 to be a bill sent to a DISH customer. DISH produced this document to Entropic on
20 June 30, 2023 in response to Entropic’s venue-related document requests.

21 19. Attached hereto as **Exhibit O** is a true and correct copy of what purports
22 to be DISH’s Home Advantage Plan Agreement. X Factor produced this document
23 to Entropic on July 19, 2023 in response to Entropic’s venue-related document
24 subpoena.

25 20. Attached hereto as **Exhibit P** is a true and correct copy of the “DISH
26 Careers” webpage, which I caused to be accessed and downloaded on August 28,
27 2023 at:

28

DECLARATION OF CHRISTINA N. GOODRICH

1 https://jobs.dish.com/jobs?page=1&sortBy=distance_from&location=Los%20Ange
2 [les&stretch=50&stretchUnit=MILES](https://jobs.dish.com/jobs?page=1&sortBy=distance_from&location=Los%20Ange). This webpage shows the results for job
3 postings within a 50-mile radius of Los Angeles, California. I also accessed this page
4 on September 5, 2023, which is included at the end of Exhibit P.

5 21. Attached hereto as **Exhibit Q** is a true and correct copy of the LinkedIn
6 profile for Jamie McDaniel, which I caused to be accessed and downloaded on
7 August 28, 2023. The link for this webpage is: [https://www.linkedin.com/in/jamie-](https://www.linkedin.com/in/jamie-mcdaniel-8030255a/)
8 [mcdaniel-8030255a/](https://www.linkedin.com/in/jamie-mcdaniel-8030255a/). I also accessed this page on September 5, 2023, which is
9 included at the end of Exhibit Q.

10 22. Attached hereto as **Exhibit R** is a true and correct copy of the LinkedIn
11 profile for Dan Minnick, which I caused to be accessed and downloaded on August
12 28, 2023. The link for this webpage is: [https://www.linkedin.com/in/dan-minnick-](https://www.linkedin.com/in/dan-minnick-5a16b6156/)
13 [5a16b6156/](https://www.linkedin.com/in/dan-minnick-5a16b6156/). I also accessed and downloaded this page on September 5, 2023, which
14 is included at the end of Exhibit R.

15 23. Attached hereto as **Exhibit S** is a true and correct copy of the “DISH
16 Careers” webpage, which my colleague accessed on August 31, 2023 at:
17 https://jobs.dish.com/jobs?page=1&sortBy=distance_from&location=Los%20Ange
18 [les&stretch=50&stretchUnit=MILES](https://jobs.dish.com/jobs?page=1&sortBy=distance_from&location=Los%20Ange). This webpage shows the results for Cable
19 Installation Technician job openings in Pacolma, Reseda, Pamnorama City, North
20 Hills, North Hollywood, Van Nuys, Granada Hills, Sun Valley, and Winnetka.

21 24. Attached hereto as **Exhibit T** is a true and correct copy of a stipulated
22 order for monetary judgement, wherein Dish Network LLC agrees it “will not contest
23 the factual and liability findings in this Court’s opinion set forth in *United States v.*
24 *Dish Network LLC*, 3:09-cv-03073-SEM-TSH, at Dkt. No. 797 (C.D. Ill. Jun. 5,
25 2017), *reported at* 256 F. Supp. 3d 810 (C.D. Ill. 2017), which I located on the
26 internet and downloaded on August 13, 2023.

1 25. Attached hereto as **Exhibit U** is a true and correct copy of a consent
2 judgment entered in *People v. DISH Network California Service Corporation, et al.*
3 Case No. 22CV008224 (Super. Ct. 2022), which I located on the internet and
4 downloaded on August 13, 2023.

5 26. Attached hereto as **Exhibit V** is a true and correct copy of a webpage
6 showing a Costa Mesa location for “Dish Network,” which I caused to be
7 downloaded on August 31, 2023 at: [https://www.hours-](https://www.hours-locations.com/search/?q=dish-network&where=costa%20mesa&x=0&y=0)
8 [locations.com/search/?q=dish-network&where=costa%20mesa&x=0&y=0](https://www.hours-locations.com/search/?q=dish-network&where=costa%20mesa&x=0&y=0). I also
9 accessed and downloaded this page on September 5, 2023, which is included at the
10 end of Exhibit V.

11 27. Attached hereto as **Exhibit W** is a true and correct copy of what purports
12 to be a list showing DISH Network L.L.C.’s Board of Directors. DISH produced this
13 document to Entropic on June 20, 2023 in response to Entropic’s venue-related
14 document requests.

15 28. Attached hereto as **Exhibit X** is a true and correct copy of the ownership
16 record for the DISH logo as kept by the Trademark Electronic Search System
17 (“TESS”), which I accessed and downloaded on September 5, 2023.

18 29. Attached hereto as **Exhibit Y** is a true and correct copy of what purports
19 to be the 2018 version of DISH’s “Agreement Regarding Confidential Information,
20 Proprietary Development and Conflict of Interest.” DISH produced this document
21 to Entropic on June 30, 2023 in response to Entropic’s venue-related document
22 requests.

23 30. Attached hereto as **Exhibit Z** is a true and correct copy of what purports
24 to be the 2021 version of DISH’s “Agreement Regarding Confidential Information,
25 Proprietary Development and Conflict of Interest.” DISH produced this document
26 to Entropic on June 30, 2023 in response to Entropic’s venue-related document
27 requests.

28

DECLARATION OF CHRISTINA N. GOODRICH

1 31. Attached hereto as **Exhibit AA** is a true and correct copy of what
2 purports to be DISH's list of Local Receive Facilities. DISH produced this document
3 to Entropic on June 22, 2023 in response to Entropic's venue-related document
4 requests.

5 32. Attached hereto as **Exhibit BB** is a true and correct copy of what
6 purports to be one of DISH's Business Rules. DISH produced this document to
7 Entropic on July 21, 2023 in response to Entropic's venue-related document requests.

8 33. Attached hereto as **Exhibit CC** is a true and correct copy of what
9 purports to be one of DISH's Business Rules. DISH produced this document to
10 Entropic on July 21, 2023 in response to Entropic's venue-related document requests.

11 34. Attached hereto as **Exhibit DD** is a true and correct copy of what
12 purports to be DISH's Retailer Agreement with Vertex Industries Inc. DISH
13 produced this document to Entropic on July 10, 2023 in response to Entropic's venue-
14 related document requests.

15 35. Attached hereto as **Exhibit EE** is a true and correct copy of what
16 purports to be the biography of Patrick Joe on DISH's "About DISH" page. DISH
17 produced this document to Entropic on June 30, 2023 in response to Entropic's
18 venue-related document requests.

19 36. Attached hereto as **Exhibit FF** is a true and correct copy of what
20 purports to be DISH Network Corporation's 10-k for the fiscal year ending on
21 December 31, 2022. DISH produced this document to Entropic on June 20, 2023 in
22 response to Entropic's venue-related document requests.

23 37. Attached hereto as **Exhibit GG** is a true and correct copy of what
24 purports to be DISH California's bylaws. DISH produced this document to Entropic
25 on June 30, 2023 in response to Entropic's venue-related document requests.
26
27
28

DECLARATION OF CHRISTINA N. GOODRICH

1 I declare under penalty of perjury under the laws of the United States and
2 California that the foregoing is true and correct.

3
4 Executed on September 5, 2023 in Los Angeles, California.

5
6 

7 Christina N. Goodrich
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF CHRISTINA N. GOODRICH